



Entergy Nuclear Northeast
Indian Point Energy Center
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Fred Dacimo
Site Vice President
Administration

March 23, 2005

Re: Indian Point Unit No. 3
Docket No. 50-286
NL-05-029

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop O-P1-17
Washington, D.C. 20555-0001

Subject: Licensee Event Report 2005-001-00, "Plant in a Condition Prohibited
by Technical Specifications due to Error Making Control Room
Ventilation System Inoperable"

Dear Sir:

Pursuant to 10 CFR 50.73(a)(1), Entergy Nuclear Operations Inc. (ENO) hereby provides Licensee Event Report (LER) 2005-001-00. The enclosed LER identifies an event where the plant was operated in a condition prohibited by Technical Specifications, which is reportable under 10 CFR 50.73(a)(2)(i)(B). This condition has been recorded in the ENO Corrective Action Program as Condition Report CR-IP3-2005-00315.

There are no new commitments identified in this letter. Should you have any questions regarding this submittal, please contact Mr. Patric W. Conroy, Manager, Licensing at (914) 734-6668.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Dacimo".

Fred R. Dacimo
Site Vice President
Indian Point Energy Center

cc: next page

Handwritten initials "JED2" in black ink.

cc: Mr. Samuel J. Collins
Regional Administrator – Region I
U.S. Nuclear Regulatory Commission

Resident Inspector's Office
Indian Point Energy Center
U.S. Nuclear Regulatory Commission

Mr. Paul Eddy
New York State
Public Service Commission

INPO Record Center
700 Galleria Parkway
Atlanta, Georgia 30339-5957

LICENSEE EVENT REPORT (LER)

Estimated burden per response to comply with this mandatory collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. FACILITY NAME
INDIAN POINT 3

2. DOCKET NUMBER
05000-286

3. PAGE
1 OF 4

4. TITLE **Plant in a Condition Prohibited by Technical Specifications due to Error Making Control Room Ventilation System Inoperable**

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV. NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
05	01	2001	2005	001	00	3	24	2005	FACILITY NAME	DOCKET NUMBER 05000
									FACILITY NAME	DOCKET NUMBER 05000

9. OPERATING MODE 1	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)										
	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)							
10. POWER LEVEL 100%	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)							
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)							
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)							
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input checked="" type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)							
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)							
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)							
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER							
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)								

Specify in Abstract below or in NRC Form 366A

12. LICENSEE CONTACT FOR THIS LER

NAME: **Richard Schmitt, Maintenance Superintendent - Electrical**
TELEPHONE NUMBER (Include Area Code): **(914) 844-8476**

13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED

YES (If yes, complete 15. EXPECTED SUBMISSION DATE) NO

15. EXPECTED SUBMISSION DATE

MONTH	DAY	YEAR

16. ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced type written lines)

On January 26, 2005, at approximately 1900 hours, with steady state reactor power at 100%, Indian Point Energy Center (IPEC) determined that the Control Room Ventilation System (CRVS) "B" damper was operating with linkage in the reverse position and therefore was inoperable (it would open on a close signal and close to the incident mode on an open signal). Damper B is designed to allow filtered outside air intake in the 10 Percent Incident mode and to isolate outside air intake during normal operation and the 100 Percent Incident mode. This condition was determined to have existed since May 5, 2001. The apparent cause of this event was incomplete work instructions in that no details as to how to connect the linkage were included in the installation work package. These details were not available when the work package was issued. Contributing was the failure of the post work test to determine that damper B was not closed in the Normal and 100 Percent Incident mode. The condition was determined to be a violation of Technical Specifications. Corrective action was taken to repair damper B. Additional corrective action will be taken to determine why the post work test did not detect that damper B was incorrectly configured and to initiate corrective action on how to determine the damper is closed. There was no significant effect on the public health and safety since the system maintained required functional capability.

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Indian Point Unit 3	05000-286	2005	- 01	- 00	2 OF 4

NARRATIVE (If more space is required, use additional copies of NRC Form 366A) (17)

Note: The Energy Industry Identification System Codes are identified within the brackets {}.

DESCRIPTION OF EVENT

On January 26, 2005, at approximately 1900 hours, with steady state reactor power at 100%, the Indian Point Energy Center (IPEC), Systems Engineering Department (SE), determined that the Control Room Ventilation System (CRVS) {VI} damper B {DMP} was operating with linkage in the reverse position. Condition Report CR-IP3-2005-00315 was written to document this event. The event was determined to be reportable under 10 CFR 50.73(a)(2)(i)(B), a violation of Technical Specifications, at approximately 1400 hours on January 27, 2005.

The CRVS is divided into two trains with each train consisting of a filter booster fan {FAN} with associated inlet damper and the following components which are common to both trains: the control room filter {FLT} unit (consists of two roughing filters, two high efficiency particulate air (HEPA) filters and, two activated charcoal adsorbers {ADS}); manual outside air isolation damper; damper A (filter unit bypass for normal operation), damper B (filter unit inlet for outside air makeup), damper C (filter unit inlet for recirculated air), and the toilet and locker room exhaust fan. The CRVS is an emergency system, parts of which are in service during normal unit operations.

The CRVS has three different air flow configurations. Normal operation uses the air conditioning fans to supply about 1500 cfm of outside air through damper A and re-circulates about 8500 cfm of air. The 10 Percent Incident mode isolates damper A, provides unfiltered air recirculation by two safety related air conditioning fans, and uses a booster fan to both recirculate and filter about 1000 cfm through damper C and take in 35 to 400 cfm of outside air through damper B. The 100 Percent Incident mode isolates outside air by closing dampers A and B, provides unfiltered air recirculation by one of two safety related air conditioning fans and uses a booster fan to recirculate and filter air through damper C. The 10 Percent Incident mode is for radiological events and the 100 Percent Incident mode is for chemical and smoke events.

On May 5, 2001, damper B was replaced in its entirety and a new linkage was installed. The linkage was not installed properly at this time. When damper B was in the open position the linkage was installed in the reverse or closed position. As a result of this installation, when the damper received a close signal it further opens from the incident mode position and when it received an open signal, it closes, but only to the preset incident mode position. Activation instrumentation was not affected. This is not detectable by indication since the damper indication was set following installation of the arm based on the expected position (i.e., it was set to show open when it is closed and closed when it is open). This damper position error was identified on January 26, 2005 during the performance of tracer gas testing of the unit 3 Control Room (CR) {NA}. An evaluation established that the apparent cause of this error was incomplete work instructions in that no details as to how to connect the linkage was included in the work package. These details were not available when the work package was issued.

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NARRATIVE (If more space is required, use additional copies of NRC Form 366A) (17)

The CRVS was post-work tested, using the test for TS Surveillance Requirement 3.7.11.4, to verify that the Control Room (CR) {NA} experienced a slight positive pressure. The system flows are determined at various locations of the CRVS during the surveillance to assure the required flow ranges for outside air and re-circulated air are met. The 10 Percent Incident mode surveillance flow requirements were met because damper B went from an open position to the 10 Percent Incident position while working in reverse rather than from closed to the 10 Percent Incident position. The 100 Percent Incident mode surveillance flow requirements were also met even though damper B went further open. Engineering is currently evaluating how the surveillance flow requirements were met and how to assure that future post-work tests confirm that damper B is properly operating.

At the time of discovery the CRVS was out of service using a one time allowed outage time of 14 days for the performance of the tracer gas test. Damper B was repaired in the normal course of events for that test (the test required damper B to be disabled and subsequently restored). There was only one damper B replaced so there is no extent of condition.

CAUSE OF EVENT

The apparent cause of this error was inadequate work instructions. There were no details as to how to connect the linkage included in the work package since these details were not available at the time the work package was issued. A contributing cause was the failure of the post work test to detect that damper B was not operating properly for the Normal and 100 Percent Incident modes.

CORRECTIVE ACTIONS

The following corrective actions have been or will be performed under Entergy's Corrective Action Program to address the cause and prevent recurrence:

- The damper was repaired and planning included the proper linkage detailed instructions in the repair package.
- An Entergy fleet procedure (i.e., EN-WM-105 Rev 0 - PLANNING) has been issued with a scheduled implementation date of May 15, 2005. This procedure requires planners to use available resources (e.g., vendor manuals, drawings) to develop an understanding of equipment function and operational characteristics, to reference those in the instructions and to include drawings.
- Corrective action has been initiated to determine why the post work test in May 2001 did not detect that damper B was not operating properly for the Normal and 100 Percent Incident modes and to initiate corrective action on how to determine the damper is operating properly. This is scheduled for May 1, 2005

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NARRATIVE (If more space is required, use additional copies of NRC Form 366A) (17)

EVENT ANALYSIS

This event is reportable under 10 CFR 50.73(a)(2)(i)(B), any event or condition that resulted in the nuclear power plant operating in a condition prohibited by TS. Damper B has been inoperable since May 5, 2001. The TS bases state that "The CRVS is considered Operable when the individual components necessary to limit operator exposure are OPERABLE in both trains." This includes damper B. The damper remained inoperable until repaired after entry into TS 3.7.11 condition C on January 25, 2005 to perform tracer gas testing.

A review was conducted of Licensee Event Reports (LER) in the past two years for non-compliance with TS. LER 2003-004 reported a TS non-compliance due to improper document use.

EVENT SAFETY SIGNIFICANCE

This event had no significant effect on the health and safety of the public. There were no actual safety consequences because the plant was not challenged, while damper B was inoperable, by an actual event that could affect the habitability of the Control Room. Additionally, there was no loss of safety function for the CRVS. As demonstrated by surveillance test, the 10 Percent Incident mode flow requirements were met with the inoperable damper. During normal operation the open damper B would not affect charcoal filter operability since the dampers to the two booster fans were closed effectively eliminating flow. The 100 Percent Incident mode, which was affected, is entered for toxic gas and smoke events, but is not solely relied upon to maintain CR habitability. The CR requires the use of self contained breathing apparatus, with backup air bottles, by CR personnel to maintain habitability for a toxic gas or smoke event. The close signal to damper B during the 100 Percent Incident mode would allow the introduction of a greater amount of toxic gas due to the damper opening. However, SCBA are donned prior to loss of habitability. The operators also had the manual outside air isolation damper available to isolate the CR (it is intended to be redundant to damper B should it fail). Therefore the function of the 100 Percent Incident mode was maintained. Since the CR functions were not lost, the event had no significant effect on public health and safety.